

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ANTHONY VASILIADES,

Defendant.

Criminal No. 1:15-CR-74



STATEMENT OF FACTS

The United States and the defendant, ANTHONY VASILIADES, agree that the United States would have proven the following facts at trial, beyond a reasonable doubt, with admissible and credible evidence:

1. From in and around December 2014 through on or about January 14, 2015, in the Eastern District of Virginia and elsewhere, the defendant, ANTHONY VASILIADES, knowingly and intentionally conspired to possess with intent to distribute a mixture and substance containing cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

2. Beginning in or about December 2014, VASILIADES's co-conspirator, Minas Politis, contacted a Confidential Source (CS) to enlist the CS in finding a source from which VASILIADES and Politis could purchase cocaine.

3. VASILIADES and Politis subsequently traveled to the Washington, D.C. area to meet with the CS and discuss potential drug transactions.

4. In a series of telephone calls from on or about January 9, 2015 to on or about January 14, 2015, Politis and the CS negotiated the terms of a cocaine purchase and coordinated the date of the anticipated transaction. The parties ultimately agreed that VASILIADES and

Politis would pay the CS \$50,000 in exchange for two kilograms of cocaine. VASILIADES provided the \$50,000 that he and Politis agreed to pay the CS. VASILIADES and Politis reached an agreement by which both would profit from the drug transaction.

5. On January 14, 2015, at approximately 2:30 p.m., VASILIADES and Politis arrived at the location of the anticipated drug transaction, as designated by the CS. The location of the anticipated drug transaction was in the Eastern District of Virginia.

6. After VASILIADES parked his vehicle, the CS, who waited nearby, exited the vehicle in which he was parked, and entered VASILIADES's rear, driver-side passenger door. The CS retrieved a document organizer from VASILIADES's vehicle that contained \$50,000.

7. The CS exited VASILIADES's car with the \$50,000, and returned to the car in which he was parked previously. The CS then returned to VASILIADES's car with a black canvas bag containing approximately two kilograms of cocaine. The CS threw the black bag containing the cocaine into VASILIADES's car through the driver's side window. Law enforcement agents conducting surveillance of the transaction arrested VASILIADES and Politis shortly afterwards.

8. At the time of their arrest on January 14, 2015, in the Eastern District of Virginia, VASILIADES and Politis possessed approximately two kilograms of cocaine, a quantity consistent with distribution, which they purchased from the CS.

9. The acts taken by the defendant, ANTHONY VASILIADES, in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law, and were not committed by mistake, accident or other innocent reason.

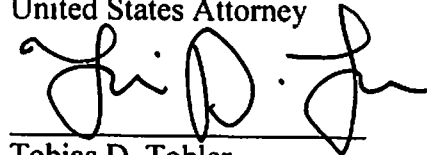
10. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case nor does it identify all of the persons with whom the defendant may have engaged in illegal activities. The defendant further acknowledges that he is obligated under his plea agreement to provide additional information about this case beyond that which is described in this statement of facts.

11. This statement of facts shall be admissible as a knowing and voluntary confession in any proceeding against the defendant regardless of whether the plea agreement is presented to or accepted by a court. Moreover, the defendant waives any rights that the defendant may have under Fed. R. Crim. P. 11(f), Fed. R. Evid. 410, the United States Constitution, and any federal statute or rule in objecting to the admissibility of the statement of facts in any such proceeding.

Respectfully submitted,

Dana J. Boente
United States Attorney

By:

A handwritten signature in black ink, appearing to read "T.D. Tobler", written over a horizontal line.

Tobias D. Tobler
Assistant United States Attorney

Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ANTHONY VASILIADES, and the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

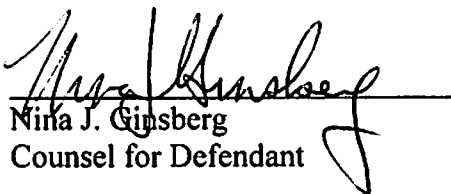
Date: 03/11/2015



Anthony Vasiliades
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have carefully reviewed the above statement of facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 3/11/15



Nina J. Ginsberg
Counsel for Defendant